

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,<sup>1</sup>

Debtor.

Chapter 11

Case No. 25-10068 (CTG)

**Objection Deadline: May 12, 2025**

**Re: Dkt No. 760**

**DECLARATION OF KEN CARON IN SUPPORT OF WLPX HESPERIA, LLC'S  
OBJECTION TO THE DEBTORS' FIRST NOTICE OF ASSUMPTION AND  
ASSIGNMENT OF CERTAIN EXECUTORY CONTRACT AND/OR UNEXPIRED  
LEASES**

I, Ken Caron, hereby declare as follows:

1. I am Senior Vice President – Commercial Development of Lewis Management Corp., a Delaware corporation (“LMC”), manager of WLPX Hesperia, LLC (“Landlord”), which operates the High Desert Gateway Shopping Center (the “Shopping Center”), located at 12799 Main Street, Hesperia, CA 92345.

2. I am over the age of 18 and have personal knowledge of the facts contained in this declaration, and, if sworn as a witness, could and would testify competently to the truth thereof. As to the following facts, I know them to be true both from my personal knowledge and my review of documents received in the ordinary course of business. I am an Authorized Agent of LMC and custodian of records of Landlord’s documents referenced in this declaration which were obtained from Landlord’s files, records, and computers. Such records are made at or near the time by, or from information transmitted by, a person with knowledge, pursuant to regular business practices, kept in the course of regularly conducted business activity, and maintained in the ordinary course of business.

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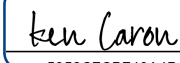
<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. I have been authorized by Landlord to submit this Declaration in support of *WLPX Hesperia, LLC's Objection to the Debtors First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* (the "Objection").

4. Prior to the commencement of the above-captioned bankruptcy case, Landlord and Debtors' predecessor in interest, Jo-Ann Stores, Inc., entered into a written Lease dated May 20, 2011 (as amended, modified or renewed from time to time, the "Lease") for the premises, consisting of approximately 20,004 square feet, within the Shopping Center (the "Premises").

5. Debtors are in default under the terms of the Lease as a result of the nonpayment of rent and other amounts owed under the Lease. As of May 5, 2025, the current amount owed by the Debtors to Landlord pursuant to the terms of the Lease is not less than \$81,515.52, plus such additional amounts, including unpaid rent, damages, interest, fees, costs or charges that Landlord may determine are owed pursuant to the terms of the Lease or applicable law. A detailed statement of the outstanding obligations is attached hereto as **Exhibit 1**.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. Executed this 12th day of May 2025 in Upland, California.

DocuSigned by:  
  
5952C7CB740A4D1...  
Ken Caron

## EXHIBIT 1

Database: LOC	Aged Delinquencies	Page: 1
	Production	Date: 5/5/2025
BLDG: 70300	70300-High Desert Gateway	Time: 02:34 PM
	Date: 5/5/2025	

Invoice Date	Category	Source	Amount	Current	30	60	90	120
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70300-001563		Jo-Ann Stores #2270		Master Occupant Id: 00001142-1			Day Due: 1	Delq Day: 10	
		Real Estate Accounting		12779	Current		Last Payment: 5/5/2025	29,624.01	
Vacate Date if Applicable:									
3/15/2023	ACM	OP EXP/CAM ACTUALIZATION	NC	-1,008.96	0.00	0.00	0.00	0.00	-1,008.96
3/15/2023	AIN	INSURANCE ACTUALIZATION	CH	208.12	0.00	0.00	0.00	0.00	208.12
2/23/2024	ACM	OP EXP/CAM ACTUALIZATION	CH	5,823.92	0.00	0.00	0.00	0.00	5,823.92
2/23/2024	AIN	INSURANCE ACTUALIZATION	CH	1,087.09	0.00	0.00	0.00	0.00	1,087.09
3/18/2024	LAT	LATE PAYMENT CHARGE	CH	250.00	0.00	0.00	0.00	0.00	250.00
12/18/2024	ATX	PROP. TAX ACTUALIZATION	CH	21,866.29	0.00	0.00	0.00	0.00	21,866.29
1/1/2025	CAM	CAM MONTHLY CHARGE	CH	3,309.38	0.00	0.00	0.00	0.00	3,309.38
1/1/2025	INS	INSUR MONTHLY CHARGE	CH	172.80	0.00	0.00	0.00	0.00	172.80
1/1/2025	RNT	BASE RENT	CH	11,157.07	0.00	0.00	0.00	0.00	11,157.07
2/1/2025	CAM	CAM MONTHLY CHARGE	CH	1,260.67	0.00	0.00	0.00	1,260.67	0.00
2/28/2025	ACM	OP EXP/CAM ACTUALIZATION	CH	13,442.15	0.00	0.00	13,442.15	0.00	0.00
2/28/2025	AIN	INSURANCE ACTUALIZATION	NC	-1,701.30	0.00	0.00	-1,701.30	0.00	0.00
3/1/2025	CAM	CAM MONTHLY CHARGE	CH	1,260.67	0.00	0.00	1,260.67	0.00	0.00
3/31/2025	ATX	PROP. TAX ACTUALIZATION	CH	21,866.28	0.00	21,866.28	0.00	0.00	0.00
4/1/2025	CAM	CAM MONTHLY CHARGE	CH	1,260.67	0.00	1,260.67	0.00	0.00	0.00
5/1/2025	CAM	CAM MONTHLY CHARGE	CH	1,260.67	1,260.67	0.00	0.00	0.00	0.00

ACM	OP EXP/CAM ACTUALIZATION	18,257.11	0.00	0.00	13,442.15	0.00	4,814.96
AIN	INSURANCE ACTUALIZATION	-406.09	0.00	0.00	-1,701.30	0.00	1,295.21
ATX	PROP. TAX ACTUALIZATION	43,732.57	0.00	21,866.28	0.00	0.00	21,866.29
CAM	CAM MONTHLY CHARGE	8,352.06	1,260.67	1,260.67	1,260.67	1,260.67	3,309.38
INS	INSUR MONTHLY CHARGE	172.80	0.00	0.00	0.00	0.00	172.80
LAT	LATE PAYMENT CHARGE	250.00	0.00	0.00	0.00	0.00	250.00
RNT	BASE RENT	11,157.07	0.00	0.00	0.00	0.00	11,157.07
<b>Jo-Ann Stores #2270 Total:</b>		81,515.52	1,260.67	23,126.95	13,001.52	1,260.67	42,865.71

ACM	OP EXP/CAM ACTUALIZATION	18,257.11	0.00	0.00	13,442.15	0.00	4,814.96
AIN	INSURANCE ACTUALIZATION	-406.09	0.00	0.00	-1,701.30	0.00	1,295.21
ATX	PROP. TAX ACTUALIZATION	43,732.57	0.00	21,866.28	0.00	0.00	21,866.29
CAM	CAM MONTHLY CHARGE	8,352.06	1,260.67	1,260.67	1,260.67	1,260.67	3,309.38
INS	INSUR MONTHLY CHARGE	172.80	0.00	0.00	0.00	0.00	172.80
LAT	LATE PAYMENT CHARGE	250.00	0.00	0.00	0.00	0.00	250.00
RNT	BASE RENT	11,157.07	0.00	0.00	0.00	0.00	11,157.07
<b>BLDG 70300 Total:</b>		81,515.52	1,260.67	23,126.95	13,001.52	1,260.67	42,865.71

ACM	OP EXP/CAM ACTUALIZATION	18,257.11	0.00	0.00	13,442.15	0.00	4,814.96
AIN	INSURANCE ACTUALIZATION	-406.09	0.00	0.00	-1,701.30	0.00	1,295.21
ATX	PROP. TAX ACTUALIZATION	43,732.57	0.00	21,866.28	0.00	0.00	21,866.29
CAM	CAM MONTHLY CHARGE	8,352.06	1,260.67	1,260.67	1,260.67	1,260.67	3,309.38
INS	INSUR MONTHLY CHARGE	172.80	0.00	0.00	0.00	0.00	172.80
LAT	LATE PAYMENT CHARGE	250.00	0.00	0.00	0.00	0.00	250.00
RNT	BASE RENT	11,157.07	0.00	0.00	0.00	0.00	11,157.07

**Grand Total:** 81,515.52 1,260.67 23,126.95 13,001.52 1,260.67 42,865.71